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"The Hospitality City"

May 19, 2006

Jay Manning, Director
Washington Dept. of Ecology
Water Quality Program
P.O. Box 47696
Olympia, WA 98504-7696

VIA EMAIL

Re: Municipal Stormwater Phase II Western Washington Comment

Dear Mr. Manning,

The City of SeaTac requests the Department of Ecology address the following comments related to the NPDES Phase II Permit for Western Washington.

1. On page 5 of 50, line 8, it states the requirements of the permit are applicable and shall be implemented throughout the entire incorporated area of the City. The Port of Seattle operates Seattle-Tacoma International Airport within the boundaries of the City of SeaTac. We are concerned that the City would be held responsible for stormwater related activities at the Airport. We request this be clarified by having the permittee not be held responsible for those entities holding individual permits (see S1.B) or owners and operators of an otherwise regulated small MS4 not required to obtain coverage (see S1.C)
2. On page 18 of 50, line 35, it states permittees will provide staff training on the identification and reporting of illicit discharges. We are concerned that the City will be unduly burdened with developing a formal training program. We would like a unified training program developed for all permittees to attend. Such a program would lessen the financial burden to permittees and provide consistent training among permittees.
3. In Condition S4, the permit would prohibit discharge of toxicants. This would be an impossible condition to meet because of the accessibility to the municipal system that allows any person at any time to place pollutants into the City's system, knowingly or unknowingly. We believe a practical approach would be to require implementation of the Stormwater Management Program as constituting Maximum Extent Practicable and compliance with the water quality standards.

4. Condition S2, C, authorizes discharges from fire fighting activities in the case of an emergency unless significant sources of pollutants are discharged. The implication is that discharge from fire training exercises would not be permitted. We believe this would be unduly burdensome and compliance would eliminate training that is essential to providing municipal fire and life safety protection. We would like to work with the Department to develop an acceptable approach to fire training discharge that can be reasonably implemented.
5. The same Condition S2, C, prohibits significant sources of pollutants to be discharged from emergency fire fighting activities. We are unclear on what constitutes 'significant'. Also, we conclude it would be impractical to initially know the potential for pollution discharge in every emergency case. We request, in this case, that pollutant discharge be prohibited once the emergency has been stabilized and the scene has been assessed for pollution potential.

The City is committed to practical control of stormwater pollution. We look forward to working with the Department to ensure the permit conditions reasonably protect receiving waters.

Thank you for your consideration.

Sincerely,



Tom Gut, P.E.
City Engineer

TG/ks

Cc: C. Ward, City Manager
D. Schoreder, Public Works Director
B. Meyer, Fire Chief
B. Duffner, Port of Seattle
D. Williams, AWC